

Licence conditions D – customer service

Commencing 1 October 2023

The Interment Industry Scheme introduces industry-wide standards for how cemeteries and crematoria provide customer service (licence conditions D.1–D.5). Although many operators provide a great service to customers, for the first time, all operators will be held to the same clear standards for how they engage with customers.

This will make it easy for people to know what to expect from operators and for operators to meet community expectations. Clear standards will also make it easier for CCNSW to monitor and support the industry to meet them.

These conditions address findings in a recent [statutory review of the Cemeteries and Crematoria Act 2013](#), highlighting the importance of customer service to the sustainability of any business. The review also outlined that the Scheme should include customer service requirements to ensure operators engage appropriately with people and communities.

The customer service conditions were developed based on existing customer service requirements in this and other industries, in consultation with industry and consumer and community representatives.

Who is required to comply?

Operators will be subject to licence conditions in one of 4 categories. See our fact sheet on licensing and categorisation [on our website](#) for more information. Operators with Category 1 licence conditions will have more customer service requirements than other operators.

D. Customer service	Licence condition	Category 1	Category 2 (including cremation only operators)	Category 3	Category 4 (Caretaker)
	D.1	Yes	Yes	Yes	No
	D.2	Yes	No	No	No
	D.3	Yes	Yes	Yes	No
	D.4	Yes	Yes	Yes	No
	D.5	Yes	Yes	Yes	No

Licence conditions summary

Please note this is a summary of the licence conditions relating to customer service. For more details read the Licence Conditions for Operators of Cemeteries and Crematoria [on our website](#).

A more detailed overview is also available in the [Guide to Conditions D \(Customer Service\)](#).

D.1 Operators must meet industry-wide customer service standards

Operators must take all reasonable steps to ensure their organisation and staff comply with the Customer Service Principles which have been developed by CCNSW. All operators must comply with this condition. The Principles include:

- the personal choices of customers must be respected
- when asked by a customer, the operator must provide all information about the products and services they provide
- operating competently, with integrity, and not bringing the industry into disrepute.

Operators must promote the importance of Customer Service to their organisation, including by making any customer service related charters or policies available to all Customers and prospective Customers.

Operators must have systems and processes in place to ensure compliance with the Customer Service Principles.

If requested, evidence of the Operator's systems and processes that are in place to support the Customer Service Principles must be provided to the Cemeteries Agency.

CCNSW has developed a Model Customer Service Charter that operators may adopt as a way of operationalising the Principles, or operators may choose to do this in some other way. The Model Customer Service Charter can be found [here](#) on [our website](#).

D.2 Operators must make sure all workers and volunteers are appropriately trained

Category 1 Operators must:

- ensure employees are trained in the Customer Service Principles
- ensure all workers are trained appropriately for their everyday activities, and hold any qualifications that are required for those activities as far as reasonably practicable
- are trained on how to familiarise themselves with cultural and religious requirements of different groups and act respectfully towards all cultures and faiths
- have appropriate disciplinary procedures and undertake appropriate disciplinary action where there has been a breach of the Customer Service Principles.

These things remain best practice for all operators.

D.3 Operators must ensure proper disclosure of information

Operators must:

- Make reasonable efforts to ensure customers fully understand all the details of what they are buying, and help customers who do not speak English or have specific communication needs
- be transparent if they recommend another provider that the operator or staff member has a financial or personal relationship with
- make sure customers are made aware of their consumer rights and have up-to-date information.

These things remain best practice for all operators.

D.4 Operators must establish a dispute resolution process

Operators must establish a process of resolving disputes and any resulting complaints between operators and customers which:

- ensures complaints are managed respectfully in an appropriate timeframe where practicable
- provides information to customers about how complaints will be managed.

Operators must also let people know about what to do if they are not satisfied with how their complaint has been handled, including the ability to refer complaints to CCNSW and the role of the Cemeteries Agency/CCNSW.

D.5 Operators must have a complaints register

Operators must establish and maintain a register of all complaints. The register should contain all relevant details as specified in the licence condition, and records should be kept for 7 years. The register must be provided to CCNSW on request.

How will CCNSW support operators?

CCNSW has developed a customer service charter template, which illustrates that an operator has the systems and processes in place to support the Customer Service Principles in line with Condition D.1. Operators may adopt this charter, or adapt it to suit their organisation. The Model Customer Service Charter can be found [here](#) on [our website](#).

CCNSW has also developed a complaints register template which operators may choose to use to meet Condition D.4. The Complaints Register Template can be found here on [our website](#).

As with each set of licence conditions, CCNSW will provide explanatory material in relation to these requirements prior to their commencement.

FAQs

What will CCNSW look for to see evidence that an operator complies with the Customer Service principles, as per D.1?

Operators should have documented procedures and policies that evidence their commitment to the customer service principles. This could include a customer service charter (using an existing document, using the CCNSW Model Customer Service Charter, or developing a bespoke charter) and training logs showing how staff are trained in relevant activities.

Systems and processes could include the use of Customer Relationship Management (CRM) systems to manage customers and complaints.

It is expected that larger operators will need more sophisticated systems and processes.

If there is already a customer service policy and/or a complaints register at a higher level (for example, for a council) which includes cemeteries, does an operator need to create a new one?

No, CCNSW will be able to assess existing procedures and documentation. If the existing procedures meet the licence requirements then they will be accepted as compliant with the requirements.